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Superior Court of California,
County of San Diego
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By Rhonda Babers, Deputy Clerk

Attorneys for Petitioners CARLSBAD POLICE OFFICERS ASSOCIATION; CORONADO POLICE OFFICERS ASSOCIATION; EL CAJON POLICE OFFICERS ASSOCIATION; HARBOR POLICE OFFICERS ASSOCIATION; NATIONAL CITY POLICE OFFICERS ASSOCIATION; OCEANSIDE POLICE OFFICERS ASSOCIATION; SAN DIEGO POLICE OFFICERS ASSOCIATION; SAN DIEGO SCHOOLS POLICE OFFICERS ASSOCIATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

CARLSBAD POLICE OFFICERS ASSOCIATION;
CORONADO POLICE OFFICERS ASSOCIATION; EL
CAJON POLICE OFFICERS ASSOCIATION; HARBOR
POLICE OFFICERS ASSOCIATION; NATIONAL CITY
POLICE OFFICERS ASSOCIATION; OCEANSIDE
POLICE OFFICERS ASSOCIATION; SAN DIEGO
POLICE OFFICERS ASSOCIATION; SAN DIEGO
SCHOOLS POLICE OFFICERS ASSOCIATION,

Petitioners,

v.

CITY OF CARLSBAD, a municipal corporation; NEIL
GALLUCCI, Chief of Police, City of Carlsbad; CITY OF
CORONADO, a municipal corporation; CHUCK KAYE,
Chief of Police, City of Coronado; CITY OF EL CAJON, a
municipal corporation; JEFF DAVIS, Chief of Police, City
of El Cajon; SAN DIEGO UNIFIED PORT DISTRICT, a
public benefit corporation; MARK STAINBROOK, Chief
of Police, San Diego Unified Port District; CITY OF
NATIONAL CITY, a municipal corporation; MANUEL
RODRIGUEZ, Chief of Police, City of National City;
CITY OF OCEANSIDE, a municipal corporation; FRANK
McCOY, Chief of Police, City of Oceanside; CITY OF
SAN DIEGO, a municipal corporation; DAVID NISLEIT,
Chief of Police, City of San Diego; SAN DIEGO
UNIFIED SCHOOL DISTRICT, a school district;
MICHAEL MARQUEZ, Chief of Police; and DOES 1
through 20, inclusive,

Respondents.

) Case No.: 37-2019-00005450-CU-WM-CTL

) Action Filed:

) **VERIFIED PETITION FOR**
) **WRIT OF MANDATE [CCP**
) **Section 1085]; ALTERNATIVE**
) **WRIT OF MANDATE [CCP**
) **Section 1087]; AND REQUEST**
) **FOR STAY ORDER**

) **"IMAGED FILE"**

) **Date:**
) **Time**
) **Dept.:**
) **Judge:**

**VERIFIED PETITION FOR WRIT OF MANDATE, ALTERNATIVE WRIT OF MANDATE,
AND REQUEST FOR STAY ORDER**

1 **I. FIRST CAUSE OF ACTION FOR PETITION FOR WRIT OF MANDATE,**

2 **ALTERNATIVE WRIT AND STAY ORDER**

3 1. For a First Cause of Action by Petitioners, CARLSBAD POLICE OFFICERS’
4 ASSOCIATION, CORONADO POLICE OFFICERS’ ASSOCIATION, EL CAJON POLICE
5 OFFICERS’ ASSOCIATION, HARBOR POLICE OFFICERS’ ASSOCIATION, NATIONAL CITY
6 POLICE OFFICERS’ ASSOCIATION, OCEANSIDE POLICE OFFICERS’ ASSOCIATION, SAN
7 DIEGO POLICE OFFICERS’ ASSOCIATION, SAN DIEGO SCHOOLS POLICE OFFICERS’
8 ASSOCIATION against Respondents CITY OF CARLSBAD, NEIL GALLUCCI, Chief of Police for
9 the City of Carlsbad; CITY OF CORONADO, CHUCK KAYE, Chief of Police for the City of
10 Coronado; CITY OF EL CAJON, JEFF DAVIS, Chief of Police for the City of El Cajon; SAN
11 DIEGO UNIFIED PORT DISTRICT, MARK STAINBROOK, Chief of Police for the San Diego
12 Unified Port District; CITY OF NATIONAL CITY, MANUEL RODRIGUEZ, Chief of Police for the
13 City of National City; CITY OF OCEANSIDE, FRANK McCOY, Chief of Police for the City of
14 Oceanside; CITY OF SAN DIEGO, DAVID NISLEIT, Chief of Police for the City of San Diego;
15 SAN DIEGO UNIFIED SCHOOL DISTRICT, MICHAEL MARQUEZ, Chief of Police for the San
16 Diego Schools Police; and DOES 1 through 20, inclusive, for a Petition for Peremptory Writ of
17 Mandate, Alternative Writ of Mandate and Stay Order, Petitioners allege as follows:

18 2. Petitioners CARLSBAD POLICE OFFICERS’ ASSOCIATION, CORONADO POLICE
19 OFFICERS’ ASSOCIATION, EL CAJON POLICE OFFICERS’ ASSOCIATION, HARBOR
20 POLICE OFFICERS’ ASSOCIATION, NATIONAL CITY POLICE OFFICERS’ ASSOCIATION,
21 OCEANSIDE POLICE OFFICERS’ ASSOCIATION, SAN DIEGO POLICE OFFICERS’
22 ASSOCIATION, SAN DIEGO SCHOOLS POLICE OFFICERS’ ASSOCIATION (hereinafter
23 referred to as the “POAs”) at all times herein mentioned was, an employee organization as defined in
24 Government Code section 3500 *et seq.* recognized to represent peace officers employed by the
25 Respondent Cities and Districts with regard to all matters concerning wages, hours and working
26 conditions. The POA’s represented employees are peace officers as defined within the California
27 Penal Code section 830.1.

28 3. Respondents CITY OF CARLSBAD, CITY OF CORONADO, CITY OF EL CAJON, SAN

**VERIFIED PETITION FOR WRIT OF MANDATE, ALTERNATIVE WRIT OF MANDATE,
AND REQUEST FOR STAY ORDER**

1 SAN DIEGO UNIFIED PORT DISTRICT, CITY OF NATIONAL CITY, CITY OF OCEANSIDE,
2 CITY OF SAN DIEGO, SAN DIEGO UNIFIED SCHOOL DISTRICT (hereinafter referred to as
3 “City District”) at all times mentioned herein was a municipal corporation, a public benefit corporation
4 or a school district, operating under the laws of the State of California. At all times herein,
5 Respondents City District were local employing agencies within the meaning of Penal Code section
6 832.5 *et seq.* maintaining peace officer personnel information, as well a local agency within the
7 meaning of the California Public Records Act, Government Code section 6252.

8 4. Respondents, NEIL GALLUCCI, CHUCK KAYE, JEFF DAVIS, MARK STAINBROOK,
9 MANUEL RODRIGUEZ, FRANK McCOY, DAVID NISLEIT, and MICHAEL MARQUEZ,
10 (hereinafter referred to as “Chiefs of Police”) at all times mentioned herein are the Chiefs of Police for
11 the Cities and Districts charged with the general supervision, administration and management of their
12 respective police departments.

13 5. At all times mentioned herein, Respondents DOES 1 through 20, inclusive, were the agents,
14 servants and employees of Respondent Cities and Districts, and in doing the things hereinafter alleged
15 were acting within the scope of their authority of such agents, servants and employees with their
16 permission and consent of the City. Petitioners will amend this Complaint to allege the true names and
17 capacities of DOES 1 through 20, inclusive when ascertained.

18 6. California Penal Code section 832.7, subdivision (a) expressly provides that “the personnel
19 records of peace officers and custodial officers and records maintained by any state or local agency
20 pursuant to Section 832.5, or information obtained from these records, are confidential and shall not be
21 disclosed in any criminal or civil proceeding except by discovery pursuant to Sections 1043 and 1046
22 of the Evidence Code.”

23 7. California Penal Code section 832.8 provides that, as used in section 832.7, “personnel
24 records” includes “any file maintained under that individual’s name by his or her employing agency
25 and containing records relating to any of the following: ... (d) Employee advancement, appraisal, or
26 discipline; (e) Complaints, or investigations of complaints, concerning an event or transaction in which
27 he or she participated, or which he or she perceived, and pertaining to the manner in which he or she
28 performed his or her duties.”

1 8. On September 30, 2018, Governor Brown approved Senate Bill 1421 which amended Penal
2 Code sections 832.7 and 832.8 relating to peace officer personnel records. Senate Bill 1421 provides
3 that peace officer or custodial officer personnel records and information concerning the following
4 categories of incidents shall *not* be confidential, and shall be made available for public inspection
5 pursuant to the CPRA: a) an incident involving the discharge of a firearm at a person by a peace
6 officer or custodial officer; b) an incident in which the use of force by a peace officer or custodial
7 officer against a person resulted in death, or in great bodily injury; c) an incident in which a sustained
8 finding was made by any law enforcement agency or oversight agency that a peace officer or custodial
9 officer engaged in sexual assault involving a member of the public; d) an incident in which a sustained
10 finding was made by any law enforcement agency or oversight agency of dishonesty by a peace officer
11 or custodial officer directly relating to the reporting, investigation, or prosecution of a crime, or
12 directly relating to the reporting of, or investigation of misconduct by, another peace officer or
13 custodial officer including, but not limited to, any sustained finding of perjury, false statements, filing
14 false reports, destruction, falsifying, or concealing of evidence. (Attached hereto as Exhibit A is a true
15 and correct copy of Chapter 988 of the 2017-2018 Regular Session, Senate Bill 1421 and made a part
16 hereof as though fully set forth in this Petition).

17 9. Senate Bill 1421 was enacted during the regular legislative session, and not designated as
18 “urgent.” Accordingly, its amendments are effective January 1, 2019. (Gov. Code § 9600.)

19 10. Senate Bill 1421 contains no legislative direction for a retroactive application of the
20 amendments to Penal Code sections 832.7 and 832.8, including no such direction as to the
21 amendment’s application to peace officer personnel records reflecting conduct or arising out of
22 incidents occurring prior to January 1, 2019 - information deemed confidential as a matter of law.

23 11. After SB 1421 was approved by the Governor, Petitioners reached out to their respective
24 police departments, cities and districts, to discuss the bill. Petitioners’ principal concern was whether
25 SB 1421 would be interpreted by Respondents to be retroactive. The concern was based on a myriad
26 of reasons, but namely: 1) POA represented peace officers made significant employment decisions in
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1 reliance on the confidentiality and privacy of their peace officer records¹; but also 2) if SB 1421 were
2 to be applied in a retroactive manner, it will be extremely burdensome on the internal operations of the
3 police departments, cities, and districts to timely comply and will require significant reallocation of
4 personnel to the potential detriment of police operations.

5 12. Carlsbad POA: Pursuant to messages on January 4, 2019, and again on January 16, 2019, at
6 approximately 1042 hours, from Carlsbad City Attorney Walter Chung and Carlsbad Police
7 Department Internal Affairs Sergeant Darbie Ernst to Carlsbad POA Director Jesse Flores, it was
8 confirmed that the Carlsbad Police Department intends to retroactively apply SB 1421 absent a stay or
9 other ruling from the California Supreme Court or another court of competent jurisdiction. (Attached
10 hereto as Exhibit B is a true and correct copy of the Declaration of Carlsbad POA Director, Jesse
11 Flores, made a part hereof as though fully set forth in this Petition.)

12 13. Coronado POA: Pursuant to a conversation on January 15, 2019, at approximately 0700
13 hours between the Coronado Police Department Chief of Police Charles Kaye and the Coronado POA
14 President William Hughes, it was confirmed that the Coronado Police Department intends to
15 retroactively apply SB 1421 absent a stay or other ruling from the California Supreme Court or
16 another court of competent jurisdiction. (Attached hereto as Exhibit C is a true and correct copy of the
17 Declaration of Coronado POA President, William Hughes, made a part hereof as though fully set forth
18 in this Petition.)

19 14. El Cajon POA: Pursuant to a conversation on January 15, 2019, at approximately 1345
20 hours with the City Attorney for the City of El Cajon Morgan Foley and El Cajon POA President
21 Travis Howard, it was confirmed that the City of El Cajon intends to retroactively apply SB 1421
22 absent a stay or other ruling from the California Supreme Court or another court of competent
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25 ¹ Peace officer are legally entitled to administratively appeal findings of misconduct and imposed discipline pursuant to the
26 Public Safety Officers Procedural Bill of Rights Act codified in Government Code sections 3300-3313, City/Police
27 Department rules and regulations, and collective bargaining agreements. The existence of such confidentiality of peace
28 officer personnel records is often a premier factor in the decision by officers to forgo their right to appeal accusations of
alleged misconduct or severity of discipline, and instead, reach a prompt resolution with the LABPD in the furtherance of
positive labor relations and in preservation of resources; despite an officer's underlying disagreement with either or both
the findings and propriety of discipline. However, if peace officers understood that they did not or would not maintain
privacy in their personnel records, they likely would have made different decisions with respect to their ability to appeal
accusation of alleged misconduct.

jurisdiction. (Attached hereto as Exhibit D is a true and correct copy of the Declaration of El Cajon POA President, Travis Howard, made a part hereof as though fully set forth in this Petition.)

15. Harbor POA: Pursuant to a conversation on January 15, 2019, at approximately 0730 hours with the San Diego Harbor Police Department (SDHPD) Chief of Police Mark Stainbrook and Harbor POA President Jonathan Taylor, it was confirmed that SDHPD intends to retroactively apply SB 1421 absent a stay or other ruling from the California Supreme Court or another court of competent jurisdiction. This was further confirmed in a follow-up email that same day from SDHPD Chief of Police Mark Stainbrook and from the San Diego Unified Port District's Attorney Ellen Gross. City Attorney Ellen Gross further explained that based on her interactions with "the San Diego District Attorneys' Office and police legal advisors from the Sheriffs Department, the cities of Chula Vista, National City, Oceanside, Carlsbad, Escondido and San Diego, [all] will be applying the new laws retroactively. (Attached hereto as Exhibit E is a true and correct copy of the Declaration of Harbor POA President, Jonathan Taylor, made a part hereof as though fully set forth in this Petition.)

16. National City POA: Pursuant to a conversation on January 15, 2019, at approximately 1300 hours with the National City Police Department (NCPD) Assistant Chief of Police Jose Tellez and National City POA President Omar Ramirez it was confirmed that the NCPD intends to retroactively apply SB 1421 absent a stay or other ruling from the California Supreme Court or another court of competent jurisdiction. (Attached hereto as Exhibit F is a true and correct copy of the Declaration of National City POA President, Omar Ramirez, made a part hereof as though fully set forth in this Petition.)

17. Oceanside POA: Pursuant to a meeting on January 14, 2019, between Oceanside Senior Deputy City Attorney Annie Hagle and Oceanside POA President James Ridenour, it was confirmed that the City of Oceanside intends to retroactively apply SB 1421 absent a stay or other ruling from the California Supreme Court or another court of competent jurisdiction. (Attached hereto as Exhibit G is a true and correct copy of the Declaration of Oceanside POA President, James Ridenour, made a part hereof as though fully set forth in this Petition.)

18. San Diego POA: Pursuant to a conversation on December 21, 2018, at approximately 1100 hours between San Diego Police Department (SDPD) Chief of Police David Nisleit and San Diego

1 POA President, Jack Schaffer, it was confirmed that the SDPD intends to retroactively apply SB 1421
2 absent a stay or other ruling from the California Supreme Court or another court of competent
3 jurisdiction. (Attached hereto as Exhibit H is a true and correct copy of the Declaration of San Diego
4 POA President, Jack Schaffer, made a part hereof as though fully set forth in this Petition.)

5 19. San Diego Schools POA: Pursuant to a conversation on January 24, 2019, with San Diego
6 Unified School District Legal Department Representative Jeff Day and the San Diego Schools POA
7 President Jay Gresham, it was confirmed that the San Diego Unified School District intends to
8 retroactively apply SB 1421 absent a stay or other ruling from the California Supreme Court or
9 another court of competent jurisdiction. (Attached hereto as Exhibit I is a true and correct copy of the
10 Declaration of San Diego Schools POA President, Jay Gresham, made a part hereof as though fully set
11 forth in this Petition.)

12 20. Senate Bill 1421 amends Penal Code section 832.7, effective January 1, 2019, to eliminate
13 the longstanding statutory confidentiality of specified peace officer or custodial officer personnel
14 records, and the information contained therein, maintained by public agencies in order to make such
15 records and information available for public inspection pursuant to the CPRA.

16 21. Senate Bill 1421 does not contain any express provision or language requiring retroactivity
17 or any clear indication that the Legislature intended the statute to operate retroactively so as to be
18 applied and enforced with respect to peace officer personnel records and information which arose out
19 of incidents involving peace officer conduct occurring prior to January 1, 2019.

20 22. The amendments constitute a substantial and adverse change to the existing privacy rights
21 of the POAs' represented peace officers. Pursuant to California Constitution, Article I, Section 3(b)(3),
22 any broad construction of statutes pertaining to the right of access to information of public agencies
23 (such as the CPRA) does *not* supersede the construction of statutes that protect the constitutional right
24 of privacy, including any statutory procedures governing discovery or disclosure of information
25 concerning the official performance or professional qualifications of a peace officer.

26 23. Petitioners' represented peace officers will suffer irreparable injury and damage by the
27 retroactive application of Senate Bill 1421, in that such an application would unlawfully violate the
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1 constitutional and statutory protection of peace officers to the confidentiality of their peace officer
2 personnel records regarding incidents or reflecting conduct occurring prior to January 1, 2019.

3 24. Petitioners have a beneficial interest in Respondents' compliance with its ministerial duty
4 not to violate Petitioners' members' confidentiality rights by applying Senate Bill 1421 retroactively.

5 Wherefore, Petitioners request the following relief against Respondents, and each of them:

6 1. That this Court forthwith issue an Alternative Writ of Mandate directing all
7 Respondents and their agents, employees and representatives to refrain from retroactively
8 enforcing or applying Senate Bill 1421's amendments to California Penal Code sections 832.7
9 and 832.8 in any manner which would result in the disclosure or production of peace officer
10 personnel records and information regarding incidents or reflecting conduct occurring prior to
11 January 1, 2019, or in the alternative, to show cause before this Court at a specified time and
12 place why Respondents have not done so;

13 2. That upon Respondents' return to the Alternative Writ of Mandate, a hearing be held
14 before this Court at the earliest practicable time so that the issue involved in this Petition may
15 be adjudicated promptly;

16 3. That pending such return and hearing on the Alternative Writ of Mandate, and until
17 this Court otherwise directs, the Court issue an immediate Stay Order or grant an injunction
18 prohibiting any retroactive enforcement or application of Senate Bill 1421 by Respondents and
19 their agents, employees and representatives in any manner which would result in the disclosure
20 or production of peace officer personnel records and information regarding incidents or
21 reflecting conduct described in Senate Bill 1421 occurring prior to January 1, 2019;

22 4. That following the hearing upon this Petition, the Court issue a peremptory writ of
23 mandate or other relief directing Respondents and their agents, employees and representatives
24 refrain from retroactively enforcing or applying the amendments to California Penal Code
25 sections 832.7 and 832.8 implemented by SB 1421 in any manner which would result in the
26 disclosure or production of peace officer personnel records regarding incidents or reflecting
27 conduct occurring prior to January 1, 2019;

1 5. That Petitioners be awarded attorneys' fees and costs of suit; and

2 6. For such other and further relief as the Court may deem just and proper.

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4 DATED: January 28, 2019

Respectfully Submitted,

5 BOBBITT, PINCKARD & FIELDS, APC

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8 Richard L. Pinckard

Bradley M. Fields

9 Amy R. Margolies

Attorneys for Petitioners

10 CARLSBAD POLICE OFFICERS ASSOCIATION;

11 CORONADO POLICE OFFICERS ASSOCIATION;

12 EL CAJON POLICE OFFICERS ASSOCIATION;

HARBOR POLICE OFFICERS ASSOCIATION;

13 NATIONAL CITY POLICE OFFICERS

ASSOCIATION; OCEANSIDE POLICE OFFICERS

14 ASSOCIATION; SAN DIEGO POLICE OFFICERS

ASSOCIATION; SAN DIEGO SCHOOLS POLICE


15 OFFICERS ASSOCIATION

VERIFICATION

I, MATT LOWE, am the President for the CARLSBAD POLICE OFFICERS' ASSOCIATION ("CPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 25, 2019 at San Diego, California.



MATT LOWE,
President for CPOA

VERIFICATION

I, WILLIAM HUGHES, am the President of the CORONADO POLICE OFFICERS' ASSOCIATION ("CPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 25, 2019 at San Diego, California.



WILLIAM HUGHES,
President for CPOA

VERIFICATION

I, TRAVIS HOWARD, am the President of the EL CAJON POLICE OFFICERS' ASSOCIATION ("ECPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 28, 2019 at San Diego, California.



TRAVIS HOWARD,
President for ECPOA

VERIFICATION

I, JONATHAN TAYLOR, am the President for the SAN DIEGO HARBOR POLICE OFFICERS' ASSOCIATION ("SDHPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 25, 2019 at San Diego, California.




JONATHAN TAYLOR,
President for SDHPOA

VERIFICATION

I, OMAR RAMIREZ, am the President for the NATIONAL CITY POLICE OFFICERS' ASSOCIATION ("NCPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 25, 2019 at San Diego, California.


OMAR RAMIREZ,
President for NCPOA

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VERIFICATION

I, JAMES RIDENOUR, am the President for the OCEANSIDE POLICE OFFICERS' ASSOCIATION ("OPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 25, 2019 at San Diego, California.



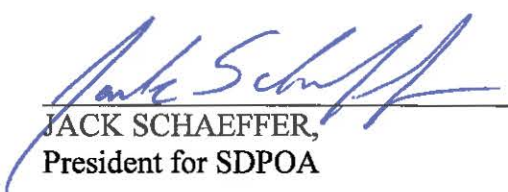
JAMES RIDENOUR,
President for OPOA

VERIFICATION

I, JACK SCHAEFFER, am the President for the SAN DIEGO POLICE OFFICERS' ASSOCIATION ("SDPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 25, 2019 at San Diego, California.



JACK SCHAEFFER,
President for SDPOA

VERIFICATION

I, JAY GRESHMAN, am the President for the SAN DIEGO SCHOOLS POLICE OFFICERS' ASSOCIATION ("SDSPOA"), Petitioner to this action. I have read the attached Verified Petition for Writ of Mandate [CCP § 1085]; Alternative Writ of Mandate [CCP § 1087]; and Request for Stay Order, and know the contents thereof. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on January 25, 2019 at San Diego, California.


JAY GRESHMAN,
President for SDSPOA